

CERTIFIED TRUE COPY

ATTEST: WILLIAM M. MCCOOL

Clerk, U.S. District Court

Western District of Washington

By

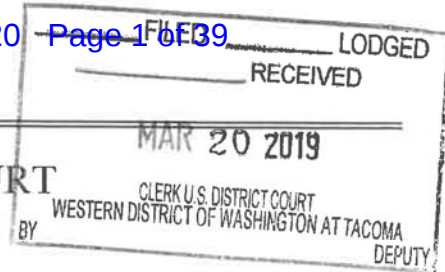
David Whiteley

Deputy Clerk



for the

Western District of Washington



In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)Subject Accounts 1-7, which are maintained,
controlled or operated by Facebook, Inc., and further
described in Attachment A

Case No.

MJ19-5041

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The Subject Accounts as further described in Attachment A, which is attached hereto and incorporated herein by this reference.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 18, U.S.C. § 2423(b)	Travel with Intent to Engage in Illicit Sexual Conduct
Title 18, U.S.C. § 2251(a)	Production of Child Pornography
Title 18, U.S.C. § 2252(a)(2)	Receipt/Distribution of Child Pornography
Title 18, U.S.C. § 2252(a)(4)(B)	Possession of Child Pornography

The application is based on these facts:

- ☒ See attached Affidavit continued on the attached sheet

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☐ by reliable electronic means; or: ☐ telephonically recorded.

Kyle McNeal
 Applicant's signature

SPECIAL AGENT KYLE McNEAL, FBI

Printed name and title

- ☒ The foregoing affidavit was sworn to before me and signed in my presence, or
☐ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/20/2019

Theresa L. Fricke
 Judge's signature

City and state: TACOMA, WASHINGTON

THERESA L. FRICKE, United States Magistrate Judge

Printed name and title

ATTACHMENT A – Facebook, Inc. Accounts

The electronically stored data, information, and communications contained in, related to, and associated with, including all preserved data associated with Facebook, Inc. accounts:

- SUBJECT ACCOUNT 1: “Moeun Yoeun” (UID: 100014267529700)
- SUBJECT ACCOUNT 2: “Moeun Nobeatches” (UID: 100029529789553)
- SUBJECT ACCOUNT 3: “Moying Yoen” (UID: 100031404392100)
- SUBJECT ACCOUNT 4: “Moo Yo” (UID: 100000914824197)
- SUBJECT ACCOUNT 5: “Morin Yuin” (UID: 100034410908581)
- SUBJECT ACCOUNT 6: “J.C.” (UID: [REDACTED])
- SUBJECT ACCOUNT 7: “Y.C.” (UID: [REDACTED])

as well as all other subscriber and log records associated with the accounts, which are located at premises owned, maintained, controlled or operated by Facebook, Inc. a social media application provider headquartered at 1601 Willow Road, Menlo Park, California, 94025.

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ATTACHMENT B

FACEBOOK, INC. ACCOUNTS to be Searched

I. Information to be disclosed

To the extent that the information described in Attachment A related to the Facebook, Inc. accounts to be searched is within the possession, custody, or control of Facebook, Inc., including any communications, records, files, logs, posts, payment records, or information that has been deleted but is still available to Facebook, Inc., or has been preserved pursuant to requests made under 18 U.S.C. § 2703(f), Facebook, Inc. is required to disclose the following information to the government for each Facebook, Inc. account identifier listed in Attachment A:

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1 a. The contents of all communications associated with the accounts,
2 including stored or preserved copies of content sent to and from the account, draft
3 communications, the source and destination of any communications, the date and time at
4 which the communications were sent;

5 b. All records or other information regarding the identification of the
6 accounts, to include full name, physical address, telephone numbers and other identifiers,
7 records of session times and durations, the date on which the accounts were created, the
8 length of service, the IP address used to register the accounts, log-in IP addresses
9 associated with session times and dates, account status, alternative e-mail addresses
10 provided during registration, methods of connecting, log files, and means and source of
11 payment (including any credit or bank account number);

12 c. The types of service utilized;

13 d. All records or other information stored at any time by an individual
14 using the accounts, including address books, contact and buddy lists, calendar data,
15 pictures, files, and the contents of any accounts associated with the identified Facebook,
16 Inc. accounts; and

17 e. All records pertaining to communications between Facebook, Inc.
18 and any person regarding the accounts, including contacts with support services and
19 records of actions taken.
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II. Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence, and instrumentalities of violations of 18 U.S.C. § 2423(b) (Travel with Intent to Engage in Illicit Sexual Conduct), 18 U.S.C. § 2251(a) (Production of Child Pornography), 18 U.S.C. § 2252(a)(2) (Receipt/Distribution of Child Pornography), and 18 U.S.C. § 2252(a)(4)(B) (Possession of Child Pornography), committed in or after 2012, including, for each account or identifier listed in Attachment A, information pertaining to the following matters:

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- 1 a. All messages, documents, and profile information, attachments, or
- 2 other data that serves to identify any persons who use or access the accounts specified, or
- 3 who exercise in any way any dominion or control over the specified accounts;
- 4 b. Any address lists or “friend”/contact lists associated with the
- 5 specified accounts;
- 6 c. All images/videos of child pornography, any messages or documents
- 7 relating to the transmission of child pornography (including any attachments thereto), and
- 8 any profile information from other file- or photo-sharing websites;
- 9 d. All messages, communications, or other documents related to the
- 10 sexual exploitation or abuse of minors, travel for the purpose, or otherwise evidencing
- 11 contact with minors or individuals purporting to be or otherwise facilitate contact with
- 12 minors.
- 13 e. The types of services utilized;
- 14 f. All subscriber records associated with the specified accounts,
- 15 including name, address, local and long distance telephone connection records, or records
- 16 of session times and durations, length of service (including start date) and types of
- 17 service utilized, telephone or instrument number or other subscriber number or identity,
- 18 including any temporarily assigned network address, and means and source of payment
- 19 for such service) including any credit card or bank account number;
- 20 g. Any and all other log records, including IP address captures,
- 21 associated with the specified accounts; and
- 22 h. Any records of communications between Facebook, Inc., and any
- 23 person about issues relating to the accounts, such as technical problems, billing inquiries,
- 24 or complaints from other users about the specified accounts, including records of contacts
- 25 between the subscriber and the provider’s support services, as well as records of any
- 26 actions taken by the provider or subscriber as a result of the communications.

27 **Notwithstanding the criminal offenses defined under 18 U.S.C. §§ 2252 and 2252A,**
28 **or any similar criminal offense, Facebook shall disclose information responsive to**
this warrant by mailing it to Federal Bureau of Investigation, Attn: Special Agent

1 Kyle McNeal at 1145 Broadway, Suite #500, Tacoma, WA 98402 or via email to
2 kmcneal@fbi.gov.
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**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
RECORDS PURSUANT TO FEDERAL RULES OF
EVIDENCE 902(11) AND 902(13)**

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Facebook, and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Facebook. The attached records consist of _____ **[GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)]**. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Facebook, and they were made by Facebook as a regular practice; and

b. such records were generated by Facebook electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Facebook in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Facebook, and at all times pertinent to the records certified here the process and system functioned properly and normally.

1 I further state that this certification is intended to satisfy Rules 902(11) and
2 902(13) of the Federal Rules of Evidence.
3
4
5

6 Date

Signature

AFFIDAVIT

STATE OF WASHINGTON

ss

COUNTY OF PIERCE

I, Kyle McNeal, Special Agent, Federal Bureau of Investigation, being first duly sworn under oath, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been for approximately eight years. As part of my duties, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography and material involving the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I am a graduate of the FBI Academy and have received further specialized training in investigating child pornography and child exploitation crimes. I have also had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256(8)). At this time, I have been assigned as the South Sound Child Exploitation Task Force (SSCETF) Coordinator and work with other federal, state, and local law enforcement personnel in the investigation and prosecution of crimes involving the exploitation of minors.

2. I make this Affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant for information associated with certain social media accounts as detailed below in paragraph 3 and further described in Attachment A.

3. Records and information associated with the Facebook accounts:

- SUBJECT ACCOUNT 1: "Moeun Yoeun" (UID: 100014267529700)
- SUBJECT ACCOUNT 2: "Moeun Nobeatches" (UID: 100029529789553)

- 1 • SUBJECT ACCOUNT 3: "Moying Yoen" (UID: 100031404392100)
- 2 • SUBJECT ACCOUNT 4: "Moo Yo" (UID: 100000914824197)
- 3 • SUBJECT ACCOUNT 5: "Morin Yuin" (UID: 100034410908581)
- 4 • SUBJECT ACCOUNT 6: "J.C." (UID: [REDACTED])
- 5 • SUBJECT ACCOUNT 7: "Y.C." (UID: [REDACTED])

6 that are stored at the premises controlled by Facebook, a social media platform
7 headquartered at 1601 Willow Road, Menlo Park, CA 94025.

8 4. This affidavit is made in support of an application for a search warrant
9 under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Facebook to
10 disclose to the government copies of the information (including the content of
11 communications) further described in Section I of Attachment B. Upon receipt of the
12 information described in Section I of Attachment B, government-authorized persons will
13 review that information to locate the items described in Section II of Attachment B.

14 5. The facts set forth in this Affidavit are based on my own personal
15 knowledge; knowledge obtained from other individuals during my participation in this
16 investigation, including other law enforcement officers; the review of documents and
17 records related to this investigation; communications with others who have personal
18 knowledge of the events and circumstances described herein; and information gained
19 through my training and experience.

20 6. Because this Affidavit is submitted for the limited purpose of providing
21 sufficient facts necessary to determine whether there is probable cause in support of the
22 application for a search warrant, it does not set forth each and every fact that I or others
23 have learned during the course of this investigation. I have set forth only the facts that I
24 believe are relevant to the determination of probable cause to believe that evidence,
25 fruits, and instrumentalities of violations of 18 U.S.C. § 2423(b) (Travel with Intent to
26 Engage in Illicit Sexual Conduct), 18 U.S.C. § 2251(a) (Production of Child
27 Pornography), 18 U.S.C. § 2252(a)(2) (Receipt/Distribution of Child Pornography), and
28 18 U.S.C. § 2252(a)(4)(B) (Possession of Child Pornography).

I. SUMMARY OF INVESTIGATION

7. This investigation originated with a CyberTip report submitted by Electronic Service Provider (ESP) Facebook to the National Center for Missing and Exploited Children (NCMEC). NCMEC is a private, non-profit organization operating under a congressional mandate to act as the nation's law enforcement clearing house for information concerning online child sexual exploitation. In partial fulfillment of that mandate, NCMEC operates a CyberTip line, a resource for reporting online crimes against children. ESPs report to NCMEC, via the CyberTip line, whenever they discover that a subscriber has violated their terms of service and/or used their services to transmit child pornography or engage in sexual exploitation of minors.

8. Facebook identified four user accounts, all of which it linked to the same individual, MOEUN YOEUN:

- SUBJECT ACCOUNT 1: "Moeun Yoeun" (UID: 100014267529700)
- SUBJECT ACCOUNT 2: "Moeun Nobeatches" (UID: 100029529789553)
- SUBJECT ACCOUNT 3: "Moying Yoen" (UID: 100031404392100)
- SUBJECT ACCOUNT 4: "Moo Yo" (UID: 100000914824197)

9. According to Facebook,

A 36-year-old male appears to be enticing minors to produce and send apparent child exploitation imagery (CEI) and engage in sexual activity via private messages. Conversations indicate that he may have travelled to the Philippines in order to engage in sexual activity with minors. Profile pictures and conversations also indicate that he may be in a position of public trust as an active member of the US military.

10. Facebook provided account content associated with SUBJECT ACCOUNTS 1-3, including private messages between the user of those accounts (YOEUN) and other Facebook user(s) in the Philippines. These communications show that YOEUN intended to travel, and did in fact travel, to the Philippines to sexually abuse young girls. YOEUN also sought sexually explicit visual depictions of girls and on multiple occasions offered to pay to have people kidnapped, beaten, raped, and tortured.

11. The messages below were all exchanged by the user of SUBJECT ACCOUNTS 1-3 and two different Facebook accounts (SUBJECT ACCOUNTS 6 and 7), both of which Facebook reported were used by someone in the Philippines. From context, it seems clear that the same person is using SUBJECT ACCOUNTS 1-3. In the excerpts below, SUBJECT ACCOUNT 6 is identified as J.C., and SUBJECT ACCOUNT 7 as Y.C.

October 14, 2018

SUBJECT ACCOUNT 1: You have girls 8

J.C.: yes when meet?

SUBJECT ACCOUNT 1: Make video

J.C.: yes dad

J.C.: when you want

SUBJECT ACCOUNT 1: Now

J.C.: ok baby i send you later

SUBJECT ACCOUNT 1: How old

J.C.: after 2 hours.

J.C.: 12 or 11 years old

SUBJECT ACCOUNT 1: Face

SUBJECT ACCOUNT 1: 8 years old?

J.C.: yes dad wait

J.C.: [Facebook reported that this user sent an image of a prepubescent girl]

SUBJECT ACCOUNT 1: Name

J.C.: [Facebook reported that this user sent an image of a prepubescent girl]

1 ***

2 SUBJECT ACCOUNT 1: OK

3 SUBJECT ACCOUNT 1: "[NAME REDACTED] again"

4 J.C.: [Facebook reported that this user sent an image of a prepubescent girl]

5 ***

6 SUBJECT ACCOUNT 1: "[NAME REDACTED] will fuck"

7 J.C.: yes dad, she waiting you

8 J.C.: she always ask me about u

9 SUBJECT ACCOUNT 1: Just two Little girls in video

10 SUBJECT ACCOUNT 1: "Yes I will fuck [NAME REDACTED]"

11 J.C.: when?

12 J.C.: yes

13 SUBJECT ACCOUNT 1: Beginning of November

14 J.C.: ok dad, she waiting always

15 SUBJECT ACCOUNT 1: How much to eat their pussies

16 J.C.: you dad, how much you give each girl?

17 SUBJECT ACCOUNT 1: 2k each

18 J.C.: 12y

19 J.C.: ok dad

20 SUBJECT ACCOUNT 1: You get little girls to stay with me one night

21 SUBJECT ACCOUNT 1: I want naked one night in my bed

22 J.C.: Yes dad, when meet? november?

1 SUBJECT ACCOUNT 1: 11 November

2 J.C.: Yes dad how many little i bring?

3
4 SUBJECT ACCOUNT 1: Make sure all 7-9 years old

5 J.C.: "Ok, really sure ?you want [NAME REDACTED] is virgin?"

6 SUBJECT ACCOUNT 1: Yes and 3 others

7 J.C.: Yes dad i bring.

8 J.C.: "Yes but [NAME REDACTED] is one of I bring"

9
10 SUBJECT ACCOUNT 1: Yes of course

11 SUBJECT ACCOUNT 1: I'm gonna make her bleed

12 J.C.: Ok but 7-9 yearold eat pussy only?and if you want blowjob ?

13 ***

14
15 SUBJECT ACCOUNT 1: Yes I want to feel little girls suck dick

16
17 November 6, 2018

18 SUBJECT ACCOUNT 2: Chat me here it's moeun

19 J.C.: yes i know

20 SUBJECT ACCOUNT 2: "[NAME REDACTED] is ready?"

21 SUBJECT ACCOUNT 2: I'm gonna be her first?

22 J.C.: yes shes ready

23
24 SUBJECT ACCOUNT 2: I think gonna feel heaven

25 J.C.: yes bby.im excited and little girls

26
27 SUBJECT ACCOUNT 2: How old you give?

1 J.C.: "[NAME REDACTED] 12, [NAME REDACTED] 12, [NAME
2 REDACTED] 12"

3 SUBJECT ACCOUNT 2: **How much?**

4 ***

5 J.C.: **5k each eat pussy**

6
7 SUBJECT ACCOUNT 2: **All of them gonna suck me?**

8 J.C.: **yes i tell and i teach**

9
10 SUBJECT ACCOUNT 2: **Wow heaven**

11 **November 14, 2018**

12 SUBJECT ACCOUNT 2: **My dick is ready for the video**

13 ***

14 J.C.: **Is end u video but do jot send**

15 J.C.: **Later i send u again and 8 yearsold**

16 J.C.: [Sent a video that Facebook reported as apparent child exploitation material
17 in a separate CyberTip Report #47142073.¹]

18
19 SUBJECT ACCOUNT 2: **Nice pussy**

20 SUBJECT ACCOUNT 2: **Yummy**

21 ***

22
23 SUBJECT ACCOUNT 2: **How old**

24
25 SUBJECT ACCOUNT 2: **I want to eat that**

26
27
28 ¹ The CyberTip Report, which included the video file uploaded and sent to SUBJECT ACCOUNT 2, does not indicate whether Facebook viewed this file. As such, I have not reviewed this video to confirm whether it constitutes child exploitation material as reported by Facebook.

1 SUBJECT ACCOUNT 2: You think she can handle getting fucked?

2 J.C.: Shes virgin.maybe she agree

3
4 SUBJECT ACCOUNT 2: Can I see the 8 years old

5 December 23, 2018

6 SUBJECT ACCOUNT 3: "How is [NAME REDACTED]'s pussy"

7 SUBJECT ACCOUNT 3: I make it hurt lol

8 January 8, 2019

9
10 SUBJECT ACCOUNT 3: What girls you have right now

11 SUBJECT ACCOUNT 3: I want to cum

12 ***

13 SUBJECT ACCOUNT 3: I'm going there in February

14 ***

15
16 SUBJECT ACCOUNT 3: My phone number is +12533559252

17 SUBJECT ACCOUNT 3: "when I go to Philippines I can fuck [NAME
18 REDACTED]?"

19 January 9, 2019

20 Y.C.: Bby i have little.but she is very young

21 Y.C.: I think 6yearsold only.but picture only ?

22
23 SUBJECT ACCOUNT 3: That's very young

24 Y.C.: Yes.8y u want?

25
26 SUBJECT ACCOUNT 3: YES YES YES

27 SUBJECT ACCOUNT 3: My favorite

1 January 18, 2019

2 Y.C.: Hello bby, when video again? i have new little.

3
4 Y.C.: Beautiful and virgin. but shes 12 years old

5 SUBJECT ACCOUNT 3: I dont want 12 i want younger

6 February 6, 2019

7 Y.C.: "Hi dad im [NAME REDACTED] tomorrow you send"

8 Y.C.: [Facebook reported that Y.C. then sent three videos of apparent child
9 exploitation material, which was further documented in CyberTip Report
10 #47171078]

11 February 8, 2019

12 SUBJECT ACCOUNT 3: Capture her rape her and brake her face permanent damage

13
14 Y.C.: Rape is hard only broke face and body

15 SUBJECT ACCOUNT 3: Broken legs

16 Y.C.: Yes broken legs and broke face but not rape

17
18 SUBJECT ACCOUNT 3: Ok how much for that?

19 ***

20 Y.C.: 15 k? is maybe hard but im sure to broke face and legs

21 ***

22 SUBJECT ACCOUNT 3: Pay after finish?

23 Y.C.: Like if u send now do for tommorow. suree

24
25 SUBJECT ACCOUNT 3: I dont send first

26 SUBJECT ACCOUNT 3: Last time i send nothing happen

27
28 Y.C.: Yess. send half i paid promise sure

1 SUBJECT ACCOUNT 3: What if kill?

2 Y.C.: You need more money for kill

3 ***

4
5 Y.C.: Bby dont kill. 😊 is bad

6 February 12, 2019

7 SUBJECT ACCOUNT 3: Baby i will see you tomorrrw

8 SUBJECT ACCOUNT 3: What time are you available ?

9 SUBJECT ACCOUNT 3: I go your house or hotel?

10 Y.C.: Morning and afrnoon im available. hotel only my house is small and i shy to u

11 Y.C.: I bring littles. 2 little first? i bring

12 SUBJECT ACCOUNT 3: Ok baby

13 SUBJECT ACCOUNT 3: How old?

14 Y.C.: How many days are u hrre?

15 SUBJECT ACCOUNT 3: Until 17 feb

16 Y.C.: 9 and 11 first.

17 SUBJECT ACCOUNT 3: I'm going GO hotels north edsa

18 SUBJECT ACCOUNT 3: I'm leaving airport

19 February 16, 2019

20 Y.C.: Are u still in manila?

21 SUBJECT ACCOUNT 3: No I'm not anymore

22 ***

23
24 SUBJECT ACCOUNT 3: What girl you have

25 ***

1 Y.C.: 10 and 9 you want video bby?

2 SUBJECT ACCOUNT 3: Let me see face

3 February 17, 2019

4 SUBJECT ACCOUNT 3: How did the little girl like getting her pussy licked for the first time

5
6 12. As shown above, SUBJECT ACCOUNT 3 received three videos from Y.C.
7 on February 6, 2019. Facebook reported each video constituted apparent child
8 exploitation material and submitted CyberTip Report #47171078 to NCMEC
9 documenting this activity. I reviewed that CyberTip Report, which states that the three
10 files uploaded by Y.C. were viewed by Facebook prior to being submitted to NCMEC. I
11 reviewed these videos and describe each below:

12 Video 1: This video depicts a fully clothed minor female sitting down. She lifts up
13 her shirt and exposes her breasts to the camera. Based on her clothing, this female
14 appears to be the same prepubescent female who is one of two individuals
depicted in the videos described below.

15 Video 2: This video depicts two female minors. Based on their youthful
16 appearance, body size, lack of breast/pubic development, and lack of pubic/body
17 hair, I believe both are prepubescent. Both children are nude from the waist down.
Each minor is depicted rubbing her genitals during the video.

18 Video 3: This video depicts two female minors. Based on their youthful
19 appearance, body size, lack of breast/pubic development, and lack of pubic/body
20 hair, I believe both are prepubescent. Both children are nude from the waist down.
Each minor is shown rubbing her genitals with her fingers during the video.

21
22 13. Based on the content provided by Facebook, it appears that the same person
23 is the user of SUBJECT ACCOUNTS 1-3. As noted above, Facebook also identified
24 SUBJECT ACCOUNT 4 as another account linked to the same user. According to
25 Facebook, all four accounts are linked by machine cookies. Cookies are files placed on a
26 computer by a website. They are used for a variety of purposes, including tracking user
27 activities. A website like Facebook can place cookies on a user's computer and through
28 those cookies could potentially (and easily) note that multiple user accounts have used
the same computer.

1 14. The registration information associated with SUBJECT ACCOUNT 4
2 showed that the user of that account registered with the email address,
3 moeun.yoeun@us.army.mil. That user also listed his gender as male and provided his
4 birthdate, XX/XX/1982. U.S. Department of Defense records show that MOEUN
5 YOEUN is on active duty in the United States Army. He is a male and born on the same
6 date as the user of SUBJECT ACCOUNT 4.

7 15. As shown above, the user of SUBJECT ACCOUNT 3 provided a telephone
8 number during his communications with Y.C. U.S. Department of Defense records show
9 that the email address associated with SUBJECT ACCOUNT 4 and the telephone number
10 provided by the user of SUBJECT ACCOUNT 3 are both associated with U.S. Army
11 Staff Sergeant MOEUN YOEUN, who recently served in South Korea.

12 16. Facebook provided IP address information for each of SUBJECT
13 ACCOUNTS 1-4. These records showed that various IP addresses were associated with
14 SUBJECT ACCOUNTS 1-4 between September 2018 and February 2019. In response to
15 a summons, Comcast Communications reported IP addresses associated with each of
16 SUBJECT ACCOUNTS 1-4 were assigned to MOEUN YOEUN at his residence in
17 Steilacoom, Washington during this time.

18 17. On March 5, 2019, I obtained search warrants for YOEUN's home, car, and
19 person from the Honorable Theresa L. Fricke of the United States District Court for the
20 Western District of Washington. A team of law enforcement agents executed those
21 warrants the following day.

22 18. During the search of YOEUN's home, agents located a USB thumb drive
23 plugged into the television. A forensic preview of that thumb drive revealed it contained
24 multiple files of child pornography, including the two below which were viewed and
25 described to me by Special Agent Patrick Dospoy:

26 **FILE 1:** This image depicts a nude, prepubescent female lying on her back. She
27 is shown inserting her right index finger into her vagina. Based on her youthful
28 appearance, stature, lack of breast/muscular development, and lack of pubic/body
hair, the child is estimated to be between seven and ten years old.

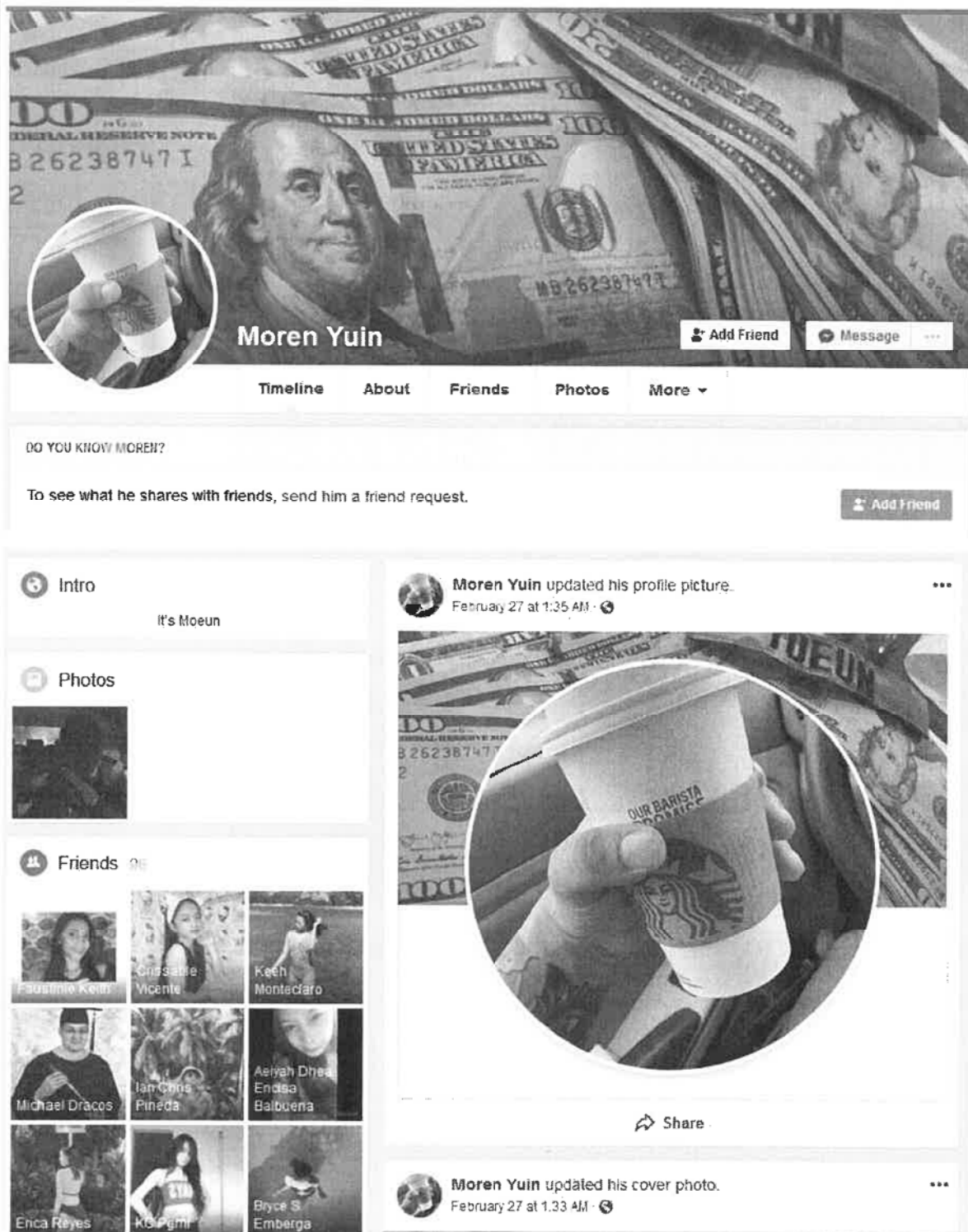
FILE 2: This image depicts a prepubescent female wearing a purple striped shirt and nude from the waist down. She is sitting with her left leg raised toward her head and right hand pulling her inner right thigh away from the left in order to expose her genitals to the camera. Her genitals are the focal point of the image. Based on her youthful appearance, stature, lack of body development, and lack of pubic/body hair, the child is estimated to be between seven and ten years old.

19. On the morning of March 6, 2019, I encountered YOEUN at Joint Base Lewis-McChord. I approached YOEUN and asked if he would be willing to answer a few questions. He agreed, and I advised him of his constitutional rights. After acknowledging he understood his rights, YOEUN participated in a recorded interview. Among other things, YOEUN acknowledged the following:

- YOEUN lives alone.
- YOEUN is the owner and user of SUBJECT ACCOUNTS 1-4 and used SUBJECT ACCOUNTS 1-3 to attempt to purchase minors for sex and/or seek out sexually explicit visual depictions of minors.
- YOEUN travelled to the Philippines in February 2019 and paid to have sexual contact with at least two minors, whom he estimated were twelve years old.

20. On March 11, 2019, I reviewed the contents of an extraction of YOEUN's iPhone, telephone number (224) 337-6686, pursuant to a search warrant. Upon reviewing the contents, I discovered SUBJECT ACCOUNT 5, another Facebook account apparently used by YOEUN. The account name was identified as "Moren Yuin" (UID: 100034410908581).

21. On March 11, 2019, I conducted an Internet search for Facebook account "Morin Yuin" and found the following information, which was publicly available. The "Intro" section on the account reads, "It's Moeun." The account contains what appeared to be an image of YOEUN in his U.S. Army Physical Fitness uniform that was posted on February 27, 2019. The following images were found on the account including an image of U.S. Currency and foreign currency with a military nameplate that reads, "YOEUN."



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USAO #2019R00192

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SEATTLE, WASHINGTON 98101
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15 22. While the information reported by Facebook did not include any
16 information to suggest YOEUN used SUBJECT ACCOUNT 5 to engage in illegal
17 activity, the other information shows that he used multiple Facebook accounts to engage
18 in these illicit activities previously. I therefore believe that SUBJECT ACCOUNT 5 may
19 contain evidence that will help to identify YOEUN and further tie him to the illegal
20 conduct reported by Facebook and/or may contain additional evidence of attempts by
21 YOEUN to sexually exploit minors.

22 23. I conducted an internet search for MOEUN YOEUN and found several
23 YouTube videos of YOEUN depicted with several different females. At least one of the
24 videos was labeled Borocay. I know Borocay to be an island in the Philippines.
25 According YouTube, this video was uploaded on or about August 9, 2016.

26 24. I also obtained travel records associated with MOEUN YOEUN from
27 Homeland Security Investigations. According to these records, YOEUN has been
28

1 traveling to and from east Asia since at least 2006. And these records show YOEUN
2 traveled to the Philippines at least as early as 2012.

3 **VI. BACKGROUND REGARDING FACEBOOK'S SERVICES**

4 25. Facebook, Inc. owns and operates the free-access social networking website
5 Facebook.com, accessed at <http://www.facebook.com>. Facebook allows its subscribers to
6 establish personal accounts. Subscribers can then use their accounts to share written
7 news, communications, photographs, videos, and other information with other Facebook
8 users, and sometimes with the general public; to purchase and sell things, play games,
9 and engage in numerous additional computer based activity.

10 26. A Facebook subscriber typically creates a personal profile using photos of
11 him/herself and a name or nickname their friends and family know. This permits friends
12 and family to find the subscriber's account. Facebook asks subscribers to provide basic
13 contact information. This may include the subscriber's full name, birth date, contact e-
14 mail addresses, physical address (city, state, zip code, and country), telephone numbers,
15 screen names, associated websites, and other personal identifiers. Subscribers can list
16 credit, debit or other financial account numbers for use when making purchases on or
17 through Facebook. Facebook also asks subscribers to create an account password. The
18 password, known only to the subscriber (and anyone to whom s/he gives it) limits access
19 to the account. Only someone logged in with the password can change profile details,
20 profile photographs or privacy settings.² Only a person who has logged into the account
21 with a password can post on the "Wall,"³ send messages (similar to text messaging), or
22 send friend requests under the identity of the account owner. Facebook subscribers rarely
23 share the password to their accounts. There is little purpose in sharing passwords,
24 because anyone whom the account owner permits can post messages on the user's "Wall."

25
26
27 ²Subscribers must also be logged into their accounts to make purchases, post ads, make comments, adjust
28 notifications they receive and to change other aspects of their accounts.

³ A "Wall" in a particular subscriber's Facebook page is a space where the subscriber and his or her "Friends" (if
permitted by the subscriber) can post and respond to status updates, check-ins, messages, images, attachments, and
links.

1 27. Subscribers can select different levels of privacy for the communications
2 and information associated with their Facebook accounts. By adjusting these privacy
3 settings, a subscriber can make profile information, status updates, check-ins, and other
4 posted material available only to himself or herself, to particular Facebook users, to all
5 Facebook users, or to anyone with access to the Internet, including people who are not
6 Facebook users.

7 28. Facebook subscribers can create personal profiles that include photographs,
8 personal statistics such as birthdate, schooling, employer, lists of personal interests, and
9 other information. Subscribers can also post “check-ins”⁴ and “status updates” about
10 their whereabouts and actions, as well as links to videos, photographs, articles, and other
11 items available elsewhere on the Internet. Facebook subscribers can also post
12 information about upcoming “events,” such as social occasions, by listing the event’s
13 time, location, host, and guest list.

14 29. A subscriber can also connect directly with individual Facebook users by
15 sending each user a “Friend Request.” If the recipient of a “Friend Request” accepts the
16 request, then the two users will become “Friends” for purposes of Facebook and can
17 exchange communications or view information about each other. Each Facebook user’s
18 account includes a list of that user’s “Friends” and a “News Feed,” which highlights
19 information about the user’s “Friends,” such as status updates, check-ins, profile changes,
20 and upcoming events. Subscribers may also join groups or networks to connect and
21 interact with other users who are members of the same group or network. A Facebook
22 network or group has options for adjusting privacy settings to grant or limit viewing or
23 posting to the group’s page.

24 30. In Facebook’s Photos application, subscribers can upload an unlimited
25 number of albums and photos. The Photos application can capture and store a geometric
26

27
28 ⁴ A “check-in” accesses the user’s mobile device GPS to let friends know exactly where the subscriber is.

1 representation of a face (Known as Faceprint data). Subscribers can “tag” (i.e., label)
2 other Facebook users depicted in a photo or video. When a user is tagged in a photo or
3 video, they receive a notification of the tag and a link to see the photo or video.

4 31. For Facebook’s purposes, a subscriber’s “Photoprint” includes all photos
5 uploaded by that subscriber that have not been deleted, as well as all photos uploaded by
6 any user that have that subscriber tagged in them. As uploaded, a digital photo often
7 contains embedded data about when and where it was taken, and other information on its
8 genesis. That information is called Exchangeable Image File Format (EXIF) information.
9 Facebook “scrapes” this information off photos before placing them onto a page, but
10 retains the original data.

11 32. Facebook users can exchange private messages on Facebook with other
12 users. These messages, which are similar to e-mail messages, are sent to the recipient’s
13 “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well
14 as other information. Facebook users can also post comments on the Facebook profiles
15 of other users or on their own profiles; such comments are typically associated with a
16 specific posting or item on the profile.

17 33. Facebook captures and retains, for each subscriber account, data regarding
18 the date, time, place, and IP addresses (IP Logs) used when the subscriber accesses
19 his/her account; actions taken and items viewed while using the account; and subscriber
20 geographic location, if that setting is enabled. This data cannot be manipulated by the
21 subscriber. Facebook also retains, and makes available to the account subscriber, all
22 information contained in Appendix A, attached and incorporated by reference. Material
23 posted by the subscriber is retained by Facebook until sometime after it is deleted by the
24 subscriber.

25 34. In Facebook jargon,

26 • Subscriber “Basic Contact Information” includes subscriber, name,
27 birth date, email address(es), physical address (city, state, zip, country), all telephone
28 numbers, screen name and any associated website;

• “Basic Subscriber Information (BSI)” is the subscriber’s identification number, name, email address, date and time stamp of account creation, registered cellular telephone number, record of recent logins, and whether the subscriber’s page is publicly viewable; and

• A “Neoprint” is an expanded view of a given subscriber profile. It includes subscriber profile contact information, friend lists; groups and networks of which the subscriber is a member; “News Feed” information; “Wall” postings; status updates; links to videos, photographs, articles, and other items; event postings; rejected “Friend” requests; comments; messages; gifts; pokes; tags; and information about the subscriber’s access and use of Facebook applications.

35. Facebook subscribers may communicate directly with Facebook about issues relating to their account, such as technical problems, billing inquiries, or complaints from the subscriber or other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the subscriber and the provider’s support services, as well records of any actions taken by the provider or subscriber as a result of the communications.

36. The company that operates Facebook.com is Facebook, Inc. Facebook, Inc. has established a contact address for Law Enforcement and has asked law enforcement to serve warrants either by using a website that Facebook has set up for use of law enforcement, or by postal mail. The website, street address, and fax number are listed above and incorporated here. Law enforcement regularly uses these to contact Facebook.

VII. PAST EFFORTS TO OBTAIN THIS EVIDENCE

37. Some of this evidence is available on digital devices seized as part of this investigation. However, additional content and records are likely in the custody or control of Facebook. In addition, preservation requests were submitted to Facebook requesting they preserve all evidence related to the listed Facebook UID numbers previously identified in paragraph 3.

VIII. INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

1 38. Pursuant to Title 18, United States Code, Section 2703(g), this application
2 and affidavit for a search warrant seeks authorization to permit Facebook, and their
3 representatives and employees, to assist agents in the execution of these warrants. Once
4 issued, the search warrants will be presented to Facebook with direction that they identify
5 the accounts described in Attachment A, as well as other subscriber and log records
6 associated with the SUBJECT ACCOUNTS, as set forth in Attachment B.

7 39. The search warrants will direct Facebook to create an exact copy of the
8 specified accounts and records.


9 40. I, and/or other law enforcement personnel will thereafter review the copy of
10 the electronically stored data, and identify from among that content those items that come
11 within the items identified in Section II to Attachment B, for seizure.

12 41. Analyzing the data contained in the forensic image may require special
13 technical skills, equipment, and software. It could also be very time-consuming.
14 Searching by keywords, for example, can yield thousands of "hits," each of which must
15 then be reviewed in context by the examiner to determine whether the data is within the
16 scope of the warrant. Merely finding a relevant "hit" does not end the review process.
17 Keywords used originally need to be modified continuously, based on interim results.
18 Certain file formats, moreover, do not lend themselves to keyword searches, as keywords,
19 search text, and many common e-mail, database and spreadsheet applications do not store
20 data as searchable text. The data may be saved, instead, in proprietary non-text format.
21 And, as the volume of storage allotted by service providers increases, the time it takes to
22 properly analyze recovered data increases, as well. Consistent with the foregoing,
23 searching the recovered data for the information subject to seizure pursuant to this
24 warrant may require a range of data analysis techniques and may take weeks or even
25 months. All forensic analysis of the data will employ only those search protocols and
26 methodologies reasonably designed to identify and seize the items identified in Section II
27 of Attachment B to the warrant.
28

42. Based on my experience and training, and the experience and training of other agents with whom I have communicated, it is necessary to review and seize a variety of messenger communications, chat logs, files, payment records and documents, that identify any users of the identified accounts and communications sent or received in temporal proximity to incriminating messages that provide context to the incriminating communications.

IX. CONCLUSION

43. Based on the forgoing, I request that the Court issue the proposed search warrants. This Court has jurisdiction to issue the requested warrants because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States . . . that - has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i). Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. Accordingly, by this Affidavit and Warrant, I seek authority for the government to search all of the items specified in Section I, Attachment B, and specifically to seize all of the data, documents and records that are identified in Section II to that same Attachment.


 Kyle McNeal, Affiant
 Special Agent
 Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me this 20th day of March, 2019.


 THERESA L. FRICKE
 United States Magistrate Judge

ATTACHMENT A – Facebook, Inc. Accounts

The electronically stored data, information, and communications contained in, related to, and associated with, including all preserved data associated with Facebook, Inc. accounts:

- SUBJECT ACCOUNT 1: “Moeun Yoeun” (UID: 100014267529700)
- SUBJECT ACCOUNT 2: “Moeun Nobeatches” (UID: 100029529789553)
- SUBJECT ACCOUNT 3: “Moying Yoen” (UID: 100031404392100)
- SUBJECT ACCOUNT 4: “Moo Yo” (UID: 100000914824197)
- SUBJECT ACCOUNT 5: “Morin Yuin” (UID: 100034410908581)
- SUBJECT ACCOUNT 6: “J.C.” (UID: [REDACTED])
- SUBJECT ACCOUNT 7: “Y.C.” (UID: [REDACTED])

as well as all other subscriber and log records associated with the accounts, which are located at premises owned, maintained, controlled or operated by Facebook, Inc. a social media application provider headquartered at 1601 Willow Road, Menlo Park, California, 94025.

ATTACHMENT B

FACEBOOK, INC. ACCOUNTS to be Searched

I. Information to be disclosed

To the extent that the information described in Attachment A related to the Facebook, Inc. accounts to be searched is within the possession, custody, or control of Facebook, Inc., including any communications, records, files, logs, posts, payment records, or information that has been deleted but is still available to Facebook, Inc., or has been preserved pursuant to requests made under 18 U.S.C. § 2703(f), Facebook, Inc. is required to disclose the following information to the government for each Facebook, Inc. account identifier listed in Attachment A:

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1 a. The contents of all communications associated with the accounts,
2 including stored or preserved copies of content sent to and from the account, draft
3 communications, the source and destination of any communications, the date and time at
4 which the communications were sent;

5 b. All records or other information regarding the identification of the
6 accounts, to include full name, physical address, telephone numbers and other identifiers,
7 records of session times and durations, the date on which the accounts were created, the
8 length of service, the IP address used to register the accounts, log-in IP addresses
9 associated with session times and dates, account status, alternative e-mail addresses
10 provided during registration, methods of connecting, log files, and means and source of
11 payment (including any credit or bank account number);

12 c. The types of service utilized;

13 d. All records or other information stored at any time by an individual
14 using the accounts, including address books, contact and buddy lists, calendar data,
15 pictures, files, and the contents of any accounts associated with the identified Facebook,
16 Inc. accounts; and

17 e. All records pertaining to communications between Facebook, Inc.
18 and any person regarding the accounts, including contacts with support services and
19 records of actions taken.

1 **II. Information to be seized by the government**

2 All information described above in Section I that constitutes fruits, contraband,
3 evidence, and instrumentalities of violations of 18 U.S.C. § 2423(b) (Travel with Intent to
4 Engage in Illicit Sexual Conduct), 18 U.S.C. § 2251(a) (Production of Child
5 Pornography), 18 U.S.C. § 2252(a)(2) (Receipt/Distribution of Child Pornography), and
6 18 U.S.C. § 2252(a)(4)(B) (Possession of Child Pornography), committed in or after
7 2012, including, for each account or identifier listed in Attachment A, information
8 pertaining to the following matters:

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1 a. All messages, documents, and profile information, attachments, or
 2 other data that serves to identify any persons who use or access the accounts specified, or
 3 who exercise in any way any dominion or control over the specified accounts;

4 b. Any address lists or “friend”/contact lists associated with the
 5 specified accounts;

6 c. All images/videos of child pornography, any messages or documents
 7 relating to the transmission of child pornography (including any attachments thereto), and
 8 any profile information from other file- or photo-sharing websites;

9 d. All messages, communications, or other documents related to the
 10 sexual exploitation or abuse of minors, travel for the purpose, or otherwise evidencing
 11 contact with minors or individuals purporting to be or otherwise facilitate contact with
 12 minors.

13 e. The types of services utilized;

14 f. All subscriber records associated with the specified accounts,
 15 including name, address, local and long distance telephone connection records, or records
 16 of session times and durations, length of service (including start date) and types of
 17 service utilized, telephone or instrument number or other subscriber number or identity,
 18 including any temporarily assigned network address, and means and source of payment
 19 for such service) including any credit card or bank account number;

20 g. Any and all other log records, including IP address captures,
 21 associated with the specified accounts; and

22 h. Any records of communications between Facebook, Inc., and any
 23 person about issues relating to the accounts, such as technical problems, billing inquiries,
 24 or complaints from other users about the specified accounts, including records of contacts
 25 between the subscriber and the provider’s support services, as well as records of any
 26 actions taken by the provider or subscriber as a result of the communications.

27 **Notwithstanding the criminal offenses defined under 18 U.S.C. §§ 2252 and 2252A,**
 28 **or any similar criminal offense, Facebook shall disclose information responsive to**
this warrant by mailing it to Federal Bureau of Investigation, Attn: Special Agent

1 Kyle McNeal at 1145 Broadway, Suite #500, Tacoma, WA 98402 or via email to
2 kmcneal@fbi.gov.
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**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
RECORDS PURSUANT TO FEDERAL RULES OF
EVIDENCE 902(11) AND 902(13)**

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Facebook, and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Facebook. The attached records consist of _____ **[GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)]**. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Facebook, and they were made by Facebook as a regular practice; and

b. such records were generated by Facebook electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Facebook in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Facebook, and at all times pertinent to the records certified here the process and system functioned properly and normally.

1 I further state that this certification is intended to satisfy Rules 902(11) and
2 902(13) of the Federal Rules of Evidence.
3
4
5

6 Date

Signature